

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JASON J. KILBORN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:22-cv-00475
)	
MICHAEL AMIRIDIS, CARYN A. BILLS,)	Hon. John Z. Lee
JULIE M. SPANBAUER, DONALD KAMM,)	Magistrate Judge Sheila M. Finnegan
and ASHLEY DAVIDSON,)	
)	
Defendants.)	

**PLAINTIFF'S RESPONSE IN PARTIAL OPPOSITION
TO DEFENDANTS' MOTION FOR EXTENSION**

Plaintiff, Jason J. Kilborn, now responds in partial opposition to Defendants' Motion for an Extension of Time to Respond to Plaintiff's Amended Complaint and for Leave to File a Brief in Excess of 15 Pages (Dkt. 14), as follows:

1. Plaintiff partially opposes Defendants' Motion. Plaintiff informed Defendants that he would not object to an extension of 14 days, and why a 28-day extension poses a problem.
2. In support of their Motion, Defendants have directed the Court to counsel's other obligations (Motion at ¶ 7). All three of Plaintiff's counsel have a two-week trial scheduled to begin on May 9, 2022 before Judge Wood in the case of *Higgins v. The Lake County Circuit Court Clerk's Office*, Case No. 17-cv-7637. Under Defendants' proposed extension, three weeks of Plaintiff's response time would fall in the week immediately prior to, and two weeks of, that trial.
3. Defendants' counsel has been involved in this case since early February of 2022, and the Amended Complaint filed February 17, 2022 added claims of defamation, false light and intentional infliction of emotional distress.

WHEREFORE, for these reasons, Plaintiff respectfully requests that Defendants' extension be limited to April 11, 2022. Should the Court disagree, Plaintiff respectfully requests that he be given until May 30, 2022 to file his response.

Respectfully submitted,

/s/ Paul K. Vickrey

Paul K. Vickrey (vickrey@vvnlaw.com)

Patrick F. Solon (solon@vvnlaw.com)

Dylan M. Brown (brown@vvnlaw.com)

VITALE, VICKREY, NIRO, SOLON & GASEY LLP

311 S. Wacker Dr., Suite 2470

Chicago, IL 60606

(312) 236-0733

Fax: (312) 236-3137

Attorneys for Plaintiff, Jason J. Kilborn